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Attorneys for Defendant

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

CATHY L. DIFRANCO,  
Plaintiff,

v.

ANDREW SAUL,  
Commissioner of Social Security,  
Defendant.

)  
) Case No. 2:19-cv-00896-APG-VCF  
)

) **JOINT STIPUATION AND**  
) **ORDER FOR EXTENSION OF TIME TO**  
) **RESPOND TO PLAINTIFF'S MOTION FOR**  
) **ATTORNEYS' FEES**  
) **(FIRST REQUEST)**

IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record, that the time for Defendant to respond to Plaintiff's Motion for Attorneys' Fees (Dkt Nos. 29, 30) be extended from April 16, 2020 to **April 30, 2020**. This is Defendant's first request for extension. Good cause exists to grant Defendant's request for extension. Counsel for Defendant (Counsel) has been out ill and on intermittent sick leave, including the date of the current deadline for Defendant to respond. In addition, Counsel also has over 100+ active social security matters, which require two more dispositive motions until mid-May. Due to unanticipated leave and heavy caseload, Counsel needs additional time to adequately review the transcript and properly respond to Plaintiff's Motion

1 for Summary Judgment. The parties further stipulate that the Court's Scheduling Order shall be  
2 modified accordingly. Defendant makes this request in good faith with no intention to unduly delay  
3 the proceedings. Counsel apologizes for the belated request, but made her request as soon as  
4 reasonably practicable following her leave.

5  
6 Respectfully submitted,

7 Dated: April 16, 2020

/s/ David Chermol  
8 (\*as authorized by email on April 16, 2020)  
9 DAVID CHERMOL  
Attorney for Plaintiff

10  
11 Dated: April 16, 2020

NICHOLAS A. TRUTANICH  
United States Attorney  
DEBORAH LEE STACHEL  
Regional Chief Counsel, Region IX  
Social Security Administration

14 By /s/ Tina L. Naicker  
15 TINA L. NAICKER  
16 Special Assistant U.S. Attorney  
Attorneys for Defendant

17 **ORDER**

18  
19 **APPROVED AND SO ORDERED:**

20 DATED: 4/17/2020

21   
UNITED STATES DISTRICT JUDGE